



## **REGULATORY & HOUSING POLICY AREA**

**DAVID A. CROWE**

Senior Staff Vice President

June 24, 2008

Brian Harris-Kojetin

OMB Desk Officer

([bharrisk@omb.eop.gov](mailto:bharrisk@omb.eop.gov))

Subject: Submission for OMB Review; Comment Request: Housing Vacancy Survey.

Dear Mr. Harris-Kojetin:

Pursuant to the notice published in the May 27, 2008 *Federal Register* (73 Fed. Reg. 30376), the National Association of Home Builders (NAHB) would like to take this opportunity to comment on the information collection proposed by the U.S. Census Bureau for the Housing Vacancy Survey (HVS).

The National Association of Home Builders is a Washington-based trade association representing more than 235,000 members involved in all aspects of home building, including the manufacturing of building products, as well as the repair, maintenance, and improvements of existing housing units. As such, NAHB and its members have a strong interest in the timely information on the condition of the U.S. housing stock produced by the HVS.

The HVS produces several key statistics that are used by both policy makers in the public sector and industry analysts and forecasters in the private sector. These include basic counts of housing units in the U.S., vacancy rates, and rates of homeownership. Housing unit counts are available in more geographic detail from the American Community Survey, but the HVS provides this information on a more timely basis. Timely data on the housing stock are needed by the U.S. Bureau of Economic Analysis to calculate the value of housing services in the U.S. for the National Income and Product Accounts.

The vacancy rates produced by the HVS are a key indicator of the balance between supply and demand in housing markets. Because, these vacancy data are provided to the public in a timely fashion, builders and product manufactures can use them to track demand for housing and make more efficient production and other business planning decisions. NAHB tracks these vacancy rates very closely, especially in recent months when demand for new housing units has been at a historic

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low point. Certain types of vacancy rates can be extracted from other data sources, but these other data sets serve very different purposes and are not close substitutes for the HVS. From NAHB's perspective, the vacancy information produced by the HVS has the virtue of being timely, consistent, easy to interpret, and focused specifically on housing.

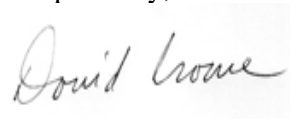
The homeownership rates produced by the HVS are among the most widely quoted and used housing statistics in the U.S. HVS data on homeownership are used by builders and product manufacturers to track market trends, as characteristics of units built and types of appliances and furnishings purchased tend to be different depending on whether a unit is owner- or renter-occupied. NAHB's 50+ Housing Council routinely uses HVS tabulations of homeownership by age of household head to track developments in housing for older Americans.

HVS homeownership data are also widely used to evaluate the effectiveness of housing policies. For example, NAHB and many other organizations use HVS data on minority homeownership to track how well housing opportunities are being extended to particular segments of the U.S. population. A recent article by NAHB analyzed relationships within each state among homeownership, house prices, and foreclosures ("Foreclosures, Production, Prices, and Homeownership by State" *Housing Economics*, April 2008). Such an analysis would have been impossible without the quarterly series on homeownership rates for which the HVS is the only source.

NAHB believes that the above examples clearly illustrate the value of the HVS and show that the quality and quantity of information provided by the HVS easily justifies the time and effort required to produce it. NAHB therefore strongly supports the HVS and urges the Office of Management and Budget to authorize the collection of information for the HVS, as requested by the Department of Commerce in the above-referenced *Federal Register* notice.

If you have any questions about NAHB's comments, please contact Paul Emrath, NAHB's Assistant Staff Vice President of Housing Policy Research (202-266-8449, [pemrath@nahb.com](mailto:pemrath@nahb.com))

Respectfully,

A handwritten signature in dark ink, appearing to read "David Crowe", is written over a light gray rectangular background.

David A. Crowe  
Senior Staff Vice President